

2. These responses are made without prejudice to responding party's right to introduce facts, documents, witnesses, or other evidence that may be subsequently discovered.

3. These responses are made without prejudice to responding party's right to supplement or amend these responses in the event that any information previously available to Responding Party may have been omitted by oversight, inadvertence, or good faith error or mistake.

4. Nothing herein shall be construed as an admission by responding party regarding the admissibility or relevance of any fact or document or of the truth or accuracy of any characterization contained in propounding party's discovery requests.

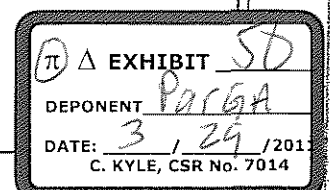
5. Responding Party specifically claims the attorney-client privilege and/or the attorney-work product privilege as to each and every response set forth herein.

RESPONSES TO SPECIAL INTERROGATORIES

Special Interrogatory No. 1: For each shift of each day of Joan Boice's residency at EMERALD HILLS, IDENTIFY all of the STAFF-MEMBERS who were on duty during that shift in the Special Care (Memory Care) Unit.

Response to Special Interrogatory No. 1: From the information available, defendant has identified the following STAFF MEMBERS as having been on duty in the Memory Care Unit during shifts during Joan Boice's residence. As discovery continues, defendant reserves the right to amend this response should additional informational responsive information become known:

DATE	AM	PM	NOC
9/12/08	Angelica Juarez Nanette Read Martiza Morales Alicia Parga	Lynda Kittle Michelle Riley Jenny Hitt Dan Naylor Jacelyn Monte	Jacelyn Monte
9/13/08	Josefina Alonso Angelica Juarez Nanette Read	Lynda Kittle Michelle Riley Dan Naylor	Jacelyn Monte
9/14/08	Josefina Alonso Heather Dunlap Nanette Read Guadalupe Pinedo Dan Naylor Alicia Parga	Michelle Riley Telia Godwin	Martiza Morales



1				
2	9/15/08	Josefina Alonso Heather Dunlap Nanette Read Guadalupe Pinedo Alicia Parga	Michelle Riley Dan Naylor Jacelyn Monte Telia Godwin	Jacelyn Monte
3				
4	9/16/08	Josefina Alonso Heather Dunlap Angelica Juárez Nanette Read Guadalupe Pinedo (Split shift) Alicia Parga	Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Jacelyn Monte
5				
6	9/17/08	Josefina Alonso Heather Dunlap Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor Telia Godwin	Dulce Viera
7				
8	9/18/08	Heather Dunlap Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales	Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor Telia Godwin	Dulce Viera
9				
10	9/19/08	Angelica Juarez Nanette Read Martiza Morales Jenny Hitt (6:59 a.m.-12:17 a.m.)	Lynda Kittle Michelle Riley Dan Naylor	Jacelyn Monte
11				
12	9/20/08	Josefina Alonso Angelica Juarez Nanette Read Martiza Morales	Lynda Kittle Michelle Riley	Jacelyn Monte
13				
14	9/21/08	Josefina Alonso Heather Dunlap Nanette Read Guadalupe Pinedo Dan Naylor	Lynda Kittle Telia Godwin	Martiza Morales
15				
16	9/22/08	Josefina Alonso Heather Dunlap Nanette Read Guadalupe Pinedo Alicia Parga Dulce Viera	Lynda Kittle Dan Naylor	Jacelyn Monte
17				
18	9/23/08	Josefina Alonso Heather Dunlap	Lynda Kittle Michelle Riley	Dan Naylor (Split shift ended 2:00 a.m.)
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				

1		Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Alicia Parga	Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor (Split shift)	
2				
3				
4	9/24/08	Josefina Alonso Heather Dunlap Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor (6:00 p.m.-10:30 p.m.)	Angelica Juarez (1:58 a.m.-10:14 a.m.) Dulce Viera
5				
6				
7				
8	9/25/08	Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor	Dulce Viera
9				
10				
11	9/26/08	Angelica Juarez Nanette Read Martiza Morales Alicia Parga	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
12				
13	9/27/08	Josefina Alonso Angelica Juarez Nanette Read Martiza Morales	Lynda Kittle Michelle Riley Hermelinda Alonso	Jacelyn Monte
14				
15	9/28/08	Josefina Alonso Heather Dunlap Nanette Read	Michelle Riley Guadalupe Pinedo Dan Naylor	Martiza Morales
16				
17	9/29/08	Josefina Alonso Heather Dunlap Nanette Read Dulce Viera	Michelle Riley Jenny Hitt Dan Naylor Alicia Parga	Jacelyn Monte
18				
19				
20	9/30/08	Josefina Alonso Heather Dunlap Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift starts 11:00a.m.) Alicia Parga	Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift ends 7:16 p.m.) Jenny Hitt Dan Naylor (6:08 p.m.-10:11 p.m.)	Jacelyn Monte
21				
22				
23				
24	10/1/08	Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
25				
26				
27				
28	10/2/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo	Heather Dunlap Lynda Kittle Guadalupe Pinedo	Dulce Viera

1		(Split shift) Dan Naylor Alicia Parga	(Split shift) Jenny Hitt	
2				
3	10/3/08	Josefina Alonso Angelica Juarez Nanette Read Martiza Morales Alicia Parga	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
4				
5				
6	10/4/08	Angelica Juarez Nanette Read Norma Garcia Dan Naylor (5:01 a.m.-9:09 a.m.)	Lynda Kittle Michelle Riley	Jacelyn Monte
7				
8				
9	10/5/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Alicia Parga	Heather Dunlap Michelle Riley	Dan Naylor
10				
11				
12	10/6/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Alicia Parga Dulce Viera	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
13				
14				
15	10/7/08	Josefina Alonso Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Heather Dunlap Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift)	Jacelyn Monte
16				
17				
18				
19	10/8/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
20				
21				
22				
23				
24	10/9/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
25				
26				
27				
28	10/10/08	Angelica Juarez Nanette Read Dan Naylor	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte

1	10/11/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor	Lynda Kittle Michelle Riley	Jacelyn Monte
2				
3				
4	10/12/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales	Heather Dunlap Michelle Riley	Dan Naylor
5				
6				
7	10/13/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Dulce Viera	Josefina Alonso (until 6 p.m.) Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
8				
9				
10	10/14/08	Josefina Alonso Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Heather Dunlap Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Jacelyn Monte
11				
12				
13				
14	10/15/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
15				
16				
17				
18	10/16/08	Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
19				
20				
21				
22	10/17/08	Angelica Juarez Nanette Read Dan Naylor (6:17 a.m.-9:32 a.m) Alicia Parga	Josefina Alonso (4:01 p.m.-9:10 p.m.) Lynda Kittle	Jacelyn Monte
23				
24				
25	10/18/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
26				
27				
28	10/19/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo	Heather Dunlap Lynda Kittle (4:32 p.m.-10:01 p.m.)	Dan Naylor

1		Martiza Morales	Michelle Riley	
2	10/20/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo Alicia Parga Dulce Viera	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
3				
4				
5				
6	10/21/08	Josefina Alonso Angelica Juarez Martiza Morales Alicia Parga	Heather Dunlap Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
7				
8				
9	10/22/08	Angelica Juarez Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Jenny Hitt	Dulce Viera
10				
11	10/23/08	Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
12				
13				
14				
15	10/24/08	Josefina Alonso Nanette Read Dan Naylor Alicia Parga	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
16				
17	10/25/08	Josefina Alonso Nanette Read Dan Naylor (6:30 a.m.-11:48 a.m.)	Lynda Kittle Michelle Riley	Dan Naylor
18				
19				
20	10/26/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales	Heather Dunlap Michelle Riley	Jacelyn Monte
21				
22	10/27/08	Josefina Alonso Nanette Read Guadalupe Pinedo Alicia Parga Dulce Viera	Josefina Alonso (until 6 p.m.) Heather Dunlap Michelle Riley	Jacelyn Monte
23				
24				
25				
26	10/28/08	Josefina Alonso Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Jacelyn Monte
27				
28				

1				
2	10/29/08	Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Lynda Kittle Michelle Riley (6:06 p.m.-10:11 p.m.) Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
3				
4				
5	10/30/08	Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
6				
7				
8				
9	10/31/08	Angelica Juarez Nanette Read Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle	Jacelyn Monte
10				
11	11/1/08	Angelica Juarez Nanette Read Guadalupe Pinedo (10:56 a.m.-3:12 p.m.)	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
12				
13				
14	11/2/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales	Lynda Kittle Michelle Riley	Dan Naylor
15				
16				
17	11/3/08	Josefina Alonso Nanette Read Guadalupe Pinedo Alicia Parga Dulce Viera	Michelle Riley Jenny Hitt	Jacelyn Monte
18				
19				
20	11/4/08	Josefina Alonso Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Martiza Morales	Heather Dunlap Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Jacelyn Monte
21				
22				
23				
24	11/5/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift starts 10:56 a.m.) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
25				
26				
27				
28	11/6/08	Angelica Juarez Guadalupe Pinedo (Split shift)	Heather Dunlap Lynda Kittle Guadalupe Pinedo	Dulce Viera

1		Martiza Morales Dan Naylor Alicia Parga	(Split shift) Jenny Hitt	
2				
3	11/7/08	Angelica Juarez Nanette Read Dan Naylor Alicia Parga	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
4				
5	11/8/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor Alicia Parga	Lynda Kittle Michelle Riley	Jacelyn Monte
6				
7				
8	11/9/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Michelle Riley	
9				
10	11/10/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Dan Naylor Alicia Parga Dulce Viera	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
11				
12				
13	11/11/08	Josefina Alonso Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Alicia Parga	Heather Dunlap Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Jacelyn Monte
14				
15				
16	11/12/08	Angelica Juarez Guadalupe Pinedo (Split shift) Dan Naylor Alicia Parga	Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
17				
18	11/13/08	Angelica Juarez Guadalupe Pinedo (Split shift starts 11:09 a.m.) Martiza Morales Dan Naylor Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift ends 7:14 p.m.) Jenny Hitt	Dulce Viera
19				
20	11/14/08	Josefina Alonso Nanette Read Dan Naylor	Lynda Kittle Michelle Riley Jenny Hitt	Jacelyn Monte
21				
22				
23				
24				
25				
26				
27				
28				

1	11/15/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor	Lynda Kittle Michelle Riley	
2				
3				
4	11/16/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Dan Naylor	Heather Dunlap Michelle Riley	Jacelyn Monte (12:16 a.m.-6:04 a.m.)
5				
6				
7	11/17/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Dan Naylor	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
8				
9				
10	11/18/08	Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift starts 10:58 a.m.) Martiza Morales	Heather Dunlap Guadalupe Pinedo (Split shift ends 7:10 p.m.) Jenny Hitt	Jacelyn Monte
11				
12				
13	11/19/08	Angelica Juarez Guadalupe Pinedo (Split shift starts 11:01 a.m.) Martiza Morales Dan Naylor	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift ends 7:12 p.m.)	Dulce Viera
14				
15	11/20/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift starts 11:03 a.m.) Martiza Morales Dan Naylor	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift ends 7:01 p.m.) Jenny Hitt	Dulce Viera
16				
17				
18				
19	11/21/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor (6:10 a.m.-10:13 a.m.)	Michelle Riley Jenny Hitt	Jacelyn Monte
20				
21				
22	11/22/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor	Michelle Riley	Jacelyn Monte
23				
24	11/23/08	Josefina Alonso Nanette Read Guadalupe Pinedo (Split shift starts 9:28 a.m.) Martiza Morales Dan Naylor	Heather Dunlap Michelle Riley Guadalupe Pinedo (Split shift ends 5:40 p.m.)	
25				
26				
27				
28	11/24/08	Nanette Read Guadalupe Pinedo Martiza Morales	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte

1		Dulce Viera		
2				
3	11/25/08	Angelica Juarez Nanette Read Martiza Morales	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
4				
5	11/26/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor	Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
6				
7				
8	11/27/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor	Heather Dunlap Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt	Jacelyn Monte
9				
10				
11				
12	11/28/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor	Heather Dunlap Lynda Kittle Jenny Hitt	Jacelyn Monte
13				
14	11/29/08	Josefina Alonso Angelica Juarez Nanette Read Dan Naylor	Lynda Kittle	Jacelyn Monte
15				
16				
17	11/30/08	Josefina Alonso Nanette Read Guadalupe Pinedo (Split shift) Martiza Morales Dan Naylor	Heather Dunlap Michelle Riley Guadalupe Pinedo (Split shift)	
18				
19				
20	12/1/08	Josefina Alonso Nanette Read Guadalupe Pinedo Martiza Morales Alicia Parga Dulce Viera	Heather Dunlap Michelle Riley Jenny Hitt	Jacelyn Monte
21				
22				
23				
24	12/2/08	Angelica Juarez Nanette Read Guadalupe Pinedo (Split shift) Martiza Morales Alicia Parga	Lynda Kittle Michelle Riley Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor	Jacelyn Monte
25				
26				
27	12/3/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift)	Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt	Dulce Viera
28				

	Martiza Morales Alicia Parga	Dan Naylor	
12/4/08	Josefina Alonso Angelica Juarez Guadalupe Pinedo (Split shift.) Martiza Morales Alicia Parga	Heather Dunlap Lynda Kittle Guadalupe Pinedo (Split shift) Jenny Hitt Dan Naylor	Dulce Viera

SPECIAL INTERROGATORY NO. 2: For each day of Joan Boice's residency at EMERALD HILLS, state the resident census in the SPECIAL CARE (Memory Care) Unit.

RESPONSE TO SPECIAL INTERROGATORY NO. 2:

DATE	CENSUS
9/12/08	15
9/13/08	15
9/14/08	15
9/15/08	15
9/16/08	15
9/17/08	15
9/18/08	15
9/19/08	15
9/20/08	15
9/21/08	15
9/22/08	15
9/23/08	15
9/24/08	15
9/24/08	15
9/25/08	16
9/26/08	16
9/27/08	16
9/28/08	16